



May 2, 2025

**VIA ECF**

Hon. Jessica G.L. Clarke  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

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**MEMO ENDORSED**

**Re: Riverkeeper, Inc. v. National Express LLC and Quality Bus Service, LLC, Inc.**  
**Docket No.: 7:25-cv-01009-JGLC**

Dear Judge Clarke:

This firm was recently retained to represent defendants, National Express LLC and Quality Bus Service, LLC, Inc., in the above-captioned matter. I and my colleague, Meredith Renquin, Esq., noticed our appearances this past Friday, May 2, 2025.

Please allow this letter to serve as an application for a 60-day adjournment of the (i) May 8, 2025 deadline to submit a proposed Civil Case Management Plan and Scheduling Order and joint letter; (ii) May 15, 2025 Initial Pretrial Conference; and (iii) May 12, 2025 deadline to respond to the Complaint.

As with the other Riverkeeper matter, Docket No. 7:24-cv-09676, Ms. Renquin and I are involved in discussions with plaintiffs' counsel, Reed W. Super, Esq., regarding the potential for fully resolving the matter before engaging in formal discovery and any responsive pleading or motion practice. As such, all parties agree that a 60-day adjournment will be beneficial in that it will allow the parties, their counsel and environmental consultants to focus their resources on settlement.

At the end of the 60-day adjournment, the parties would report to the Court on the prospects of reaching a complete settlement expeditiously, and if not, will submit a proposed Civil Case Management Plan and Scheduling Order and joint letter that has been more thoroughly informed by their substantive discussions.

Thank you for your consideration.

Respectfully submitted,

COZEN O'CONNOR

By: Eric J. Berger

cc: All Counsel via ECF

Application GRANTED. The initial pre-trial conference currently scheduled for May 15, 2025 is HEREBY ADJOURNED *sine die*. The parties shall file a joint letter, on or before **July 18, 2025**, updating the Court on their settlement efforts, or, in the alternative, submitting a case management plan and scheduling order, as well as proposing three dates for any Thursday in July and August for an initial pre-trial conference. The Clerk of Court is respectfully directed to terminate ECF No. 14.

Dated: May 6, 2025  
New York, New York

SO ORDERED.

JESSICA G. L. CLARKE  
United States District Judge